

* Original Instrument *

~~Notice to Principal is Notice to Agent~~
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Duly rejected, without dishonor or for due cause. lacks due verification and validation of presented due:
1. identification; 2. authorization; 3. authority; and,
4. indorsement.

See also: Documents 18, 19, 25, 42, 43,
46, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57,
64, 65, 66, 71, 72, 73, 74, 75, 76, all
restated and incorporated by reference, as if
set forth in full.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

FILED

2018 JAN 11 P 3:40

1-11-18 UNITED STATES OF AMERICA)
v.)
Heather Ann Tucci-Jarraf)
RANDALL KEITH BEANE, and)
HEATHER ANN TUCCI-JARRAF)

U.S. DISTRICT COURT
EASTERN DIST. TENN.
3:17-CR-82
Judges Varlan/Shirley

**UNITED STATES OF AMERICA'S NOTICE OF
EXPERT WITNESS TESTIMONY**

The United States of America, by and through J. Douglas Overbey, United States Attorney for the Eastern District of Tennessee, pursuant to Federal Rule of Criminal Procedure 16(a)(1)(e), hereby provides notice of testimony that the United States intends to use at trial in accordance with Federal Rules of Evidence 702, 703, and 705.

Zachary Scrima of the Federal Bureau of Investigation (FBI) will testify as an expert at trial. Forensic Accountant Scrima is a Certified Public Accountant and has been employed with the FBI since 2010. Forensic Accountant Scrima's resume is attached to this notice.

In his current position, Forensic Accountant Scrima is the Acting Supervisory Forensic Accountant for the FBI's Forensic Accountant Support Team based in the Washington, D.C., Headquarters of the FBI. He has provided expert financial transaction analysis for numerous investigations including, white-collar crimes, international criminal enterprises, and cyber enabled crimes. He has participated in large-scale, multi-jurisdictional investigations and performed forensic accounting services that all parties were able to understand and utilize. Forensic Accountant Scrima has acted as a financial expert in multiple bank fraud investigations and has testified in Federal District Court as an expert in financial transactions.

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As a result of this knowledge and his training and experience, Forensic Accountant Scrima will testify about the banking system and the rules and regulations that apply to most of the banking industry and the Federal Reserve.

Forensic Accountant Scrima will not state an opinion about whether the defendants' decisions constituted fraud or money laundering. Federal Rule of Evidence 704(b) precludes such testimony.

J. DOUGLAS OVERBEY
UNITED STATES ATTORNEY

By: s/ Cynthia F. Davidson
ANNE-MARIE SVOLTO
CYNTHIA F. DAVIDSON
Assistant United States Attorneys
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CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2018, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/Cynthia F. Davidson
CYNTHIA F. DAVIDSON
Assistant United States Attorney

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1-11-18
Handwritten signature


Zachary Scrima, CPA, CFE

1276 N Wayne St Unit 1005; Arlington, VA 22201 • (850) 748-7384 • zscrima@gmail.com

Summary

- High performing FBI Forensic Accountant since 2010, successfully balancing case work with leadership and program management collateral duties;
- FAST member since 2012, investigating a diverse range of violations across the country;
- Terrorist Financing Coordinator in the Mobile Field Office from 2010-2012;
- Awarded 2016 FBI Medal of Excellence.

Experience

Federal Bureau of Investigation, Forensic Accountant (August 2010 to present)

Forensic Accountant Support Team; Headquarters, Washington, D.C. (May 2012 to present)

Acting Supervisory Forensic Accountant; (November 2016 to April 2017)

- Managed the FAST's eight Forensic Accountants (FoA) and one MPA.
- Assigned several new cases to the team. Coordinated with the case agents and effectively selected the FoA with availability and interest in the violation type.
- Performed 15 file reviews, ensuring the FoAs were on the right track with their cases, not over or underworked, and provided guidance for their analysis. Shared my recent experience testifying with an FoA who was scheduled to testify soon.
- Reviewed analytical ECs for completeness, accuracy, and adherence to best practices and policies. Provided personal guidance in an encouraging manner to an FoA who prepared several ECs.
- Reached out to various contacts throughout the field and understaffed offices to proactively offer FAST assistance.
- Successfully transitioned the Team Lead role to a Regional Program Manager, effectively communicating the status of the team and recommending actions to improve the morale and performance of the FAST.

FAU Program Manager duties; (June-August 2015)

- Served as an Acting Regional Program Manager for the Forensic Accountant Unit from June-August 2015, presently continuing several of the initiatives.
- Resurrected the Forensic Accountant Unit's quarterly newsletter. Incorporated several new sections and contributions from the field, receiving positive feedback from readers.
- Updated the FAU's intranet site, starting from scratch as a new version of SharePoint had been adopted. Currently responsible for site updates and additions.
- Led the Best Practices Working Group, creating and organizing new content to include in the intranet site as a resource for all FoAs throughout the FBI.
- Reviewed applicant resumes and applications, rating individuals for interviews.
- Responsible for the FAU's West Region, answered requests and consulted with forensic accountants throughout the region.
- Trained over 100 forensic accountants on several topics during the 2014, 2015, and 2016 Forensic Accounting Core Training Sessions.

FAST Forensic Accountant; (May 2012 to present)

- Awarded 2016 FBI Medal of Excellence in recognition of outstanding dedication and overall exemplary performance beyond assigned duties.
- Provided expert financial transaction analysis for numerous violations including white-collar crimes, international criminal enterprises, and cyber enabled crimes, among others.
- Participated in large-scale, multi-jurisdictional investigations involving more than one squad, field office, or agency. Consulted with and performed forensic accounting services all parties were able to understand and utilize.

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Cause. 11-18
Heathcliff Davis*

- Testified in U.S. District Court against an alleged participant of a bank bustout scheme involving over 100 subjects and over 500 bank accounts with a loss exceeding \$17 million. Walked the jury through highlights of over 100 pages of exhibits that I produced. Successfully answered unexpected, expert witness level questioning from the defense even though I was a fact witness. The jury commented that my testimony was very credible and professional. The Acting U.S. Attorney, Central District of California, wrote a letter of commendation to Director Comey for my hard work and professional testimony.
- Assigned as the financial expert just before a superseding indictment of a bank fraud investigation. Summarized several boxes of bank records covering numerous loan lifespans with 18 bank fraud related counts in seven separate timelines. Testified in U.S. District Court, walking the jury through the effects of the defendant's actions over the life of the loans, bringing order and clarity to the victims' and witnesses' previous testimony. The jury found the defendant guilty of 11 counts of bank fraud, false entry, and misapplication of credit union funds.
- Identified and analyzed over 500 bank, credit card, and payment processor accounts involved in a multi-million-dollar synthetic identity and merchant account fraud scheme. A search warrant included my financial analysis which led to the arrest and eventual pleas of the two leaders and seizure of over \$9 million in assets located across three continents.
- Investigated dozens of Business Email Compromise (BEC) schemes. Compiled and analyzed evidence obtained from victims, domestic and overseas financial institutions, other government agencies, and internet companies. Identified commonalities among the subjects' tactics, further investigative leads, and potential targets of future attacks.
- While assigned to a BEC case in LAFO, I identified a money mule located in North Carolina. After performing additional investigation on the subject, I reached out to a Special Agent in NC whom I had previously worked with and brought him up to speed. I helped coordinate and participated in the interview of the mule which led to an indictment and guilty plea.
- Presented at the 2016 BEC All-Hands Conference in L.A., attended by over 50 government and industry experts. I presented on charging BEC money mules as an unlicensed money service transmitter and how to identify BEC money mules.
- First forensic accountant assigned to the Cyber Financial Pursuit Unit at the National Cyber Investigation Joint Task Force. Consulted with cyber agents to identify additional financial leads and performed analysis for cyber cases with a financial element.
- Assisted a cyber agent with investigating a large scale, global money mule organization. As the agent had little financial investigation experience, took the lead in determining what evidence the AUSAs required. Collected and analyzed the evidence provided by numerous financial institutions. Prepared reports tying financial records to non-traditional evidence obtained via cyber methods, producing seamless analysis of data acquired across the globe. Analysis contributed towards the indictment of four individuals located overseas.
- Led a fellow FAST member and a contractor in the analysis of a serial killer's financial records, developing a detailed timeline of the subject's whereabouts. Presented the findings to a multi-agency case coordination meeting in Seattle. Agents often referenced these results and later released them to the media for additional leads.
- Assigned to a case that a forensic accountant was already working due to the substantial quantity of financial records involved. The case involved several dozen subjects conspiring to commit hundreds of bank frauds. Once acclimated to the case, led a planning meeting to establish expectations with the case agents, forensic accountant, and her supervisor. My recommendations encouraged the supervisor to reduce the administrative requirements of the other FoA, speeding up the completion of our analysis that contributed to the arrest of 14 individuals.
- Prepared questions for, led and/or assisted over a dozen subject and witness interviews and proffers.
- Trained over 40 law enforcement personnel from West African nations in Accra, Ghana. Presented for three days on financial investigative topics such as money laundering, forensic accounting, and emerging payment technologies.
- Coordinated with case agents, Assistant US Attorneys, and other analysts to determine investigative strategies, and helped write asset forfeiture and search warrant affidavits resulting in the seizure of millions of dollars.

July reflected without disclosure for this case. 1-11-18
Heather L. Treadwell

- Guided contractors and interns assisting with my investigations, managed their workload, and provided them with feedback and direction.
- Parsed large amounts of financial data and other evidence to produce clear, concise verbal and written reports and exhibits to advise multiple individuals, including law enforcement agents, attorneys, and jurors.

Mobile Field Office; Mobile, AL (Aug. 2010 – May 2012)

- Terrorism Financing Coordinator assigned to the division's counter terrorism squad;
- Managed and performed the financial record reviews of several cases and communicated the findings with the case agents, contributing towards the case agents' knowledge of the FBI's financial investigation capabilities.
- Wrote the Terrorism Financing Coordinator Resource Guide for the Mobile Division, which other forensic accountants utilized to acclimate to the position quickly and independently.
- Networked monthly with the South Alabama Financial Crimes Task Force, a group of local banking security officers and local and federal law enforcement officers, discussing specific and trending current financial crimes. Trained the task force on the financial threats that sovereign citizens pose, strengthening local awareness of the threats.
- Convened monthly with the Southern Alabama Financial Enforcement Team at the US Attorney's Office to discuss selected local SARs and their disposition. Often led to coordination of efforts against common subjects and threats among federal agencies.
- Testified at federal grand jury for receipt of financial records.
- Drafted numerous National Security Letters and requests for Grand Jury subpoenas.
- Case Accountant for two programs, and performed various division audits.

Allianz Global Corp. & Specialty, Senior Internal Auditor, Chicago, IL (Feb. 2010–July 2010)

- Executed the planning, testing, and reporting phases of internal audits in North America and Europe.
- Illustrated and disseminated detailed financial audit findings to senior management and other organizational entities.

HSBC North America, Senior SOX Auditor (Consultant), Mettawa, IL (Nov. 2009 – Jan. 2010)

- Conducted testing and prepared detailed findings on the effectiveness of SOX 404 controls.

Hewitt Associates, Senior Audit Specialist, Lincolnshire, IL (April 2009 – September 2009)

Hewitt Associates was a \$3 billion publicly traded global provider of human resource benefits, outsourcing, and consulting services.

- Conducted testing and prepared detailed findings on the effectiveness of SOX 404 controls.

Aon Corporation, Internal Auditor, Chicago, IL (March 2006 – April 2009)

Aon is a highly regulated Fortune 500 global provider of risk management services, insurance and reinsurance brokerage, and human capital consulting.

- Executed all phases of combined internal control/ financial statement audits, follow-up audits, and SOX 404 testing for Aon's risk brokerage, consulting, and underwriting business units using Generally Accepted Accounting Principles (GAAP).
- Investigated and received extensive training on Foreign Corrupt Practices Act regulatory issues. Utilized the knowledge during audits worldwide to ensure each office was in compliance with internal anti-bribery policies and that their internal controls were adequate to prevent and detect FCPA violations.
- Developed the Internal Audit Department's Investigation Methodology and Policy Manual from current company procedures and industry best practices. Trained all four global regional offices on its contents and expectations, improving the internal investigation process worldwide.
- Investigated numerous allegations of financial fraud covering a multitude of abuses and consequence.
- Performed audits in Brazil, India, Vietnam, Philippines, Italy, Mexico, and Canada with each office offering their own unusual conditions and challenges.

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 Heather Ann Turner

- Guided management in identifying key internal control risks and developing processes to adequately mitigate those risks.
- Justified audit findings with management, working towards mutual acceptance from the various groups involved. The improved relationship with management led to congenial audit reports and swift remediation of the issues.
- Performed complex audits of Aon's underwriting and reinsurance business units.
- Prepared process narratives, tests of internal controls, finding summaries, and reports identifying discrepancies, significant issues, and their corrective recommendations.
- Monitored and reported on the status of investigations from all four global IA offices to the VP of Internal Audit, establishing a filtered, concise reporting structure to the VP.
- Maintained and inventoried all global IAD investigations, significantly improving the department's ability to reference and track current and past investigations. This proved invaluable when third parties requested investigation records.
- Trained, mentored, and led new hires throughout the audit process and SOX testing, increasing the capabilities of the department as a whole.

Bally Total Fitness, Internal Auditor; Chicago, IL (April 2005 – March 2006)

- *Sarbanes-Oxley*: Performed testing of numerous processes for 2004 and 2005. Created and edited narratives, control matrices, workpapers, and testing issue summaries.
- *Four-Year Restatement*: Worked with Bally's external auditor, KPMG, in completing the 2001-2004 financial statement audit. Performed numerous debt reperformances and account reconciliations ensuring the accuracy and timeliness of the accounting transactions.

US Navy, Officer; Pensacola, FL (May 2003-November 2004)

- Student Naval Aviator & Flight Duty Officer (July 2003 - Nov. 2004).

Education

Certified Fraud Examiner, October 2009

Certified Public Accountant, October 2007

University of Illinois at Urbana-Champaign

B.S. in Accounting May 2003

Training

Federal Bureau of Investigation

- 2015 Complex Financial Crimes Conference, San Antonio, TX August 2015;
- 2015 CPA Conference, Kansas City, MO July 2014;
- Virtual Currency Emerging Threats Working Group, FBI HQ ongoing;
- Instructional Strategies Course, FBI Quantico Nov. 2014
- Presentation Skills Course, FBI HQ Sept. 2014;
- 2014 CPA Conference, Norman, OK July 2014;
- Advanced Mortgage Fraud conference, FBI HQ June 2014;
- 2014 Corruption & Extractives Conference, McLean, VA May 2014;
- Interview Techniques for Forensic Accountants, FBI HQ June 2013;
- FBI Terrorism Financing Coordinators conferences, 2010 (Tampa) and 2011 (HQ);
- FBI Regional Asset Forfeiture Conference, Atlanta Sept. 27-28, 2011;
- Forensic Accountant Core Training Session, served as a group project team leader, Quantico Oct.-Nov. 2010.

ACFE Global Fraud Conference, Las Vegas, NV June 2016

SANS Institute – SEC301: Intro to Information Security, Reston, VA March 2015

Association of Certified Fraud Examiners (ACFE), member since August 2007

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1-11-18
Deborah Ann Trosini-Jarvis.*

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37830-380405



Certificate of Service

I certify that on January 11, 2018, this original instrument, DUE REJECTION WITHOUT DISHONOR FOR DUE CAUSE, was duly issued and caused to be delivered by personal service to the alleged Clerk of Court. Notice of this filing is purportedly sent by operation of the alleged Court's electronic filing system to all alleged parties indicated on the electronic filing receipt. Alleged parties purportedly may access this filing through the alleged Court's electronic filing system. With further due notice and certification made and given that I am not responsible, accountable, or liable for any actions, no-actions, and inability of the alleged Clerk of Court, her alleged deputies, and alleged office, and the electronic filing system they access, utilize, manage, and whether it is in a timely manner. As a result, alternative electronic service to all alleged parties may be made via email delivery.

1-11-18

Original